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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC., CONSUMER  
PRIVACY USER PROFILE LITIGATION

THIS DOCUMENT RELATES TO:  
ALL ACTIONS

Case No. 18-md-02843-VC-JSC

**DECLARATION OF MATTHEW  
MONTGOMERY IN SUPPORT OF  
DISCOVERY LETTER REGARDING  
PLAINTIFFS' REQUEST FOR  
PRODUCTION NO. 43**

I, Matthew Montgomery, declare and state as follows:

1. I am an attorney licensed in the State of California and admitted to the United States District Court for the Northern District of California. I am Of Counsel for the California Office of Bleichmar Fonti & Auld LLP (“BFA”), Co-Lead Counsel for Plaintiffs in *In re Facebook, Inc. Consumer Privacy User Profile Litigation*, Case No. 18-md-02843-VC (the “MDL”), and a member in good standing of the bar of the State of California and of this Court.

2. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently to them. This declaration is made in support of Discovery Letter Regarding Plaintiffs’ Request for Production No. 43.

3. Attached hereto as Exhibit A is a true and correct copy of an excerpt from the November 25, 2019, Plaintiffs’ Second Set of Requests for Production to Defendant Facebook, Inc.

4. Attached hereto as Exhibit B is a true and correct copy of an excerpt from the December 26, 2019, Defendant Facebook, Inc.’s Responses and Objections to Plaintiffs’ Second Set of Requests for Production to Defendant Facebook, Inc.

5. Attached hereto as Exhibit C is a true and correct copy of a March 4, 2020 letter from defense counsel.

6. Attached hereto as Exhibit D is a true and correct copy of an excerpt from the May 6, 2020, Plaintiffs’ Third Set of Requests for Production to Defendant Facebook, Inc.

7. Attached hereto as Exhibit E is a true and correct copy of an excerpt from the June 19, 2020, Defendant Facebook, Inc.’s Responses and Objections to Plaintiffs’ Third Set of Requests for Production.

8. Attached hereto as Exhibit F is a true and correct copy of an excerpt consisting of Bates Numbers FB-CA-MDL-00009462, 9466, and 9467 from a document produced by Facebook Bates Numbered FB-CA-MDL-00009455-9501.

9. Attached hereto as Exhibit G is a true and correct copy of an excerpt consisting of Bates Number FB-CA-MDL-00013451 from a document produced by Facebook Bates Numbered FB-CA-MDL-00013451-13457.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct and to the best of my knowledge. This declaration was executed in Davis, California.

DATED: February 12, 2021

/s/ Matthew Montgomery  
Matthew Montgomery